

July 10, 2015

**VIA E-MAIL**  
**SLRGUIDANCEDOCUMENT@COASTAL.CA.GOV**

California Coastal Commission  
c/o Sea Level Rise Working Group  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Re: Sea Level Rise Policy Guidance Public Review Draft Released May 27, 2015

## **I. Introduction**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Coastal Commission's (Commission) Draft Sea Level Rise Policy Guidance (Draft Guidance).

PG&E provides gas and electric service to millions of Californians from a reliable and sustainable energy portfolio. We understand the need to manage our carbon footprint, advance policies that put California and the country on a cost-effective path toward a low-carbon economy, and address the emerging need to adapt to changing climate conditions. Addressing sea level rise on a collaborative regional and statewide basis is important for enhancing coastal protection and longevity and PG&E applauds the Commission's efforts in developing the Draft Guidance.

## **II. Sea Level Rise Science**

PG&E supports the Commission's assertion that the National Research Council Committee's (NRCC) report, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future*, as the best available science for sea level rise in California. However, for planning purposes, the 2050 sea level rise predictions provided in the NRCC's report should be used as the planning standard, not the 2100 estimates. While the Draft Guidance uses 2100 as the standard for planning, it is not typical business and investment practice to plan for an 85-year time period. A typical business planning cycle is 15 to 20 years and capital budgets generally function on even shorter timelines. By identifying the 2050 estimates as the standard for planning purposes, exaggeration of sea level rise impacts and incompatibility with capital and business cycles are avoided.

### **III. Planning Guidance**

Benchmarking and historical evaluation of extreme weather events should be the initial steps taken and become the starting points for sea level rise evaluations of critical infrastructure.

For effective planning, it is critical that sea level rise be addressed in a consistent and uniform approach, whereby all interested parties utilize the same data and same predictive models. If disparate, non-standardized approaches are used, there is an increased chance that estimates of sea level rise may be exaggerated and result in estimated long-term risks of coastal hazards are much greater than actual long-term risks.

PG&E recommends that a greater priority be placed on protection and modification of infrastructure, as opposed to relocation, in the development of new policies for Local Coastal Programs to address protection of infrastructure from coastal hazards (including sea level rise). The latter may result in greater impacts to coastal resources, including environmentally sensitive habitat areas and wetlands. Moreover, relocation may be more expensive to implement, thereby increasing costs to customers within PG&E's service territory.

PG&E would like the opportunity to work with the Commission, coastal cities, and coastal counties in continued sea level rise land use planning and development of effective new policies that protect vital infrastructure from the threat of coastal hazards due to sea level rise in a manner that avoids and/or minimizes impacts to coastal resources in a cost-effective manner.

### **IV. Impacts on Low Income Communities**

The Commission's assessment of the impact of sea level rise on communities appears to focus exclusively on coastal communities and recreational uses and did not address the opportunity to provide meaningful analysis on how sea level rise and salt water intrusion will affect low elevation and low income communities in the Bay Delta region. An understanding of the potential impacts on these communities is critical in developing strategies to address sea level rise in these areas and PG&E encourages the Commission to develop policies to address concerns in these communities.

### **V. Conclusion**

PG&E appreciates the opportunity to review and provide comments on the Draft Guidance and looks forward to continued collaboration with the Commission.

Sincerely,

/s/

Valerie Winn